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January 8, 2015

Roger C. Sherman  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
Washington, DC 20554

Re: Application of hardy Cellular Telephone Company and McBride Spectrum Partners, LLC ("McBride") For Consent to Assign License (WT Docket No. 14-240)

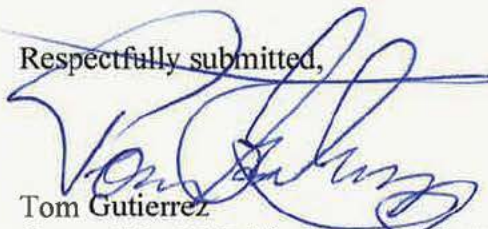
Dear Mr. Sherman:

On behalf of McBride Spectrum Partners, LLC, this will respond to your correspondence of December 9, 2014 to Mr. Vincent D. McBride. By that letter, you posed a single inquiry to McBride. That inquiry, and the response thereto, is provided in the Enclosure I attached.<sup>1</sup>

Given the straight-forward nature of both the question and answer presented herein, no request for confidential treatment of this submission is being made.

We trust this to be responsive to your inquiry. Should you have any questions regarding this matter, or the application generally insofar as how it relates to McBride, please communicate directly with this office.

Respectfully submitted,



Tom Gutierrez  
Counsel for McBride Spectrum Partners, LLC

Enclosure

cc: Scott Patrick  
Kate Matraives  
Jim Bird

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<sup>1</sup> This response, and a companion one from the proposed assignee, were both due January 5, 2014. An extension was requested by, and granted to, the assignee. Generally, extensions of a response date in a multi-party proceeding apply to all parties. In the event the staff views that not to be the case here, request is hereby made to have the extension apply to McBride.

## ENCLOSURE I

**QUESTION:** Explain in detail the decision made by McBride to assign the Lower 700 MHz A Block spectrum that is the subject of this application to USCC, including any attempts made to enter in a sale of this spectrum or alternative arrangements with parties other than USCC.

**ANSWER:** McBride Spectrum Partners, LLC ("McBride"), through counsel and in pro se submissions, has been a strong advocate of interoperability for the spectrum at issue. As the Commission effectively recognized when it determined in September, 2013 to expressly mandate interoperability, without interoperability the utility of the spectrum here at issue would be severely compromised. Unfortunately, when the Commission did expressly require interoperability, which was some four years after such relief was requested, the Commission authorized a four year delay in actually providing the relief. Given that, McBride sought other means of making the spectrum available to serve the public, including assigning it to other carriers who have the greater financial resources necessary to assure that the now-mandated interoperability becomes a reality.

The proposed assignee is the only entity with whom McBride discussed assignment of the particular license at issue in the subject application. McBride had entered into discussion with one other entity regarding a larger license that included the spectrum here at issue. In each of the discussions, the ability of the potential assignee, as a larger, more financial secure carrier, to utilize better the spectrum to serve the public interest played a significant role for McBride. In each of the discussions, McBride and the potential assignee were introduced through spectrum brokers. In one instance, there was a buyer's broker, and in the other instance a seller's broker.